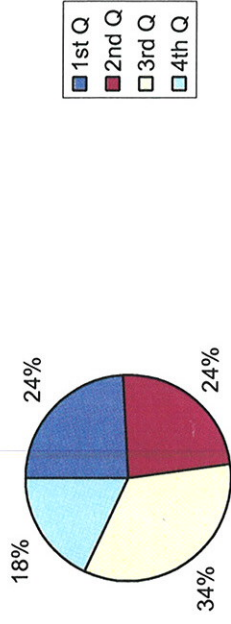
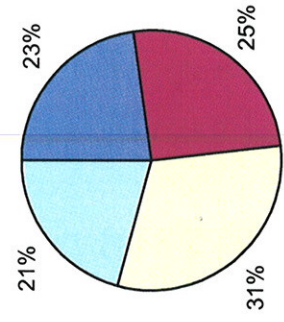
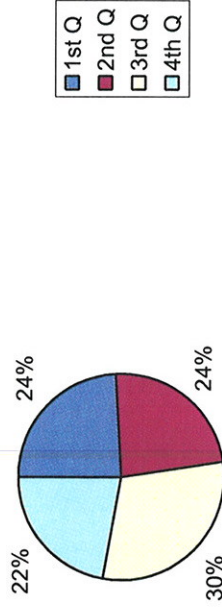


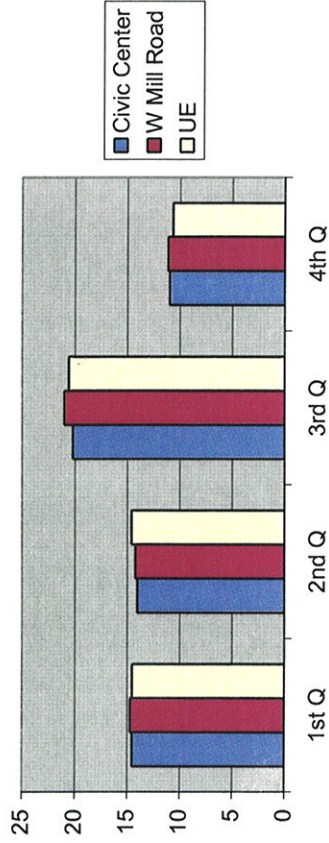
Proportional Contribution 2003



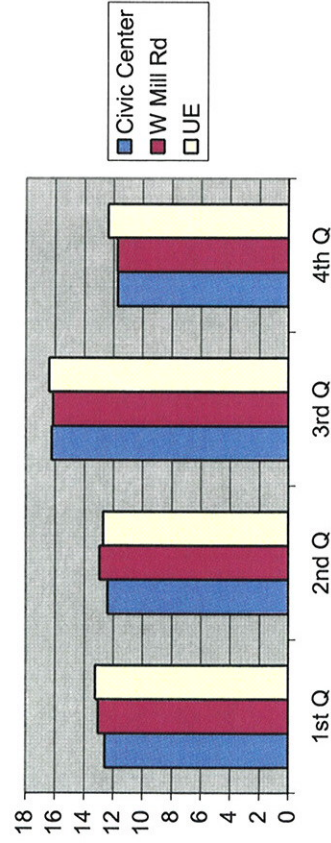
Proportional Contribution 2004



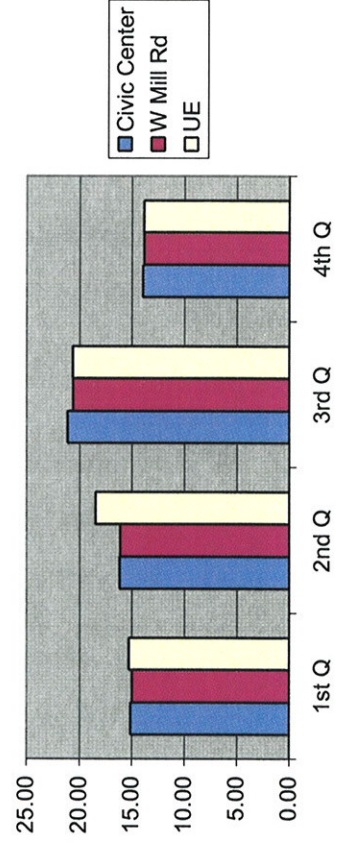
2003 PM2.5



2004 PM2.5



2005 PM2.5







### **Valley Watch Comment Addendum**

Further investigation of just a portion of the data for 2007 shows something terribly amiss.

IDEM's data for the Mill Road Monitor on July 7, 2007 as supplied by Vanderburgh County Ozone Officer, JoAnn Alexandrovich indicates a reading of 9  $\mu\text{g}/\text{m}^3$  for that day.

However, data taken from directly from IDEM's particulate web site for that monitor at:

[http://www.state.in.us/idem/air/amb/data/pm/evansville\\_pm.html](http://www.state.in.us/idem/air/amb/data/pm/evansville_pm.html)

indicates that readings on that monitor reached at least a 24 hour average of 32.1  $\mu\text{g}/\text{m}^3$ .

There is no explanation in the documentation as to why such disparities would exist.

Therefore, Valley Watch recommends that a truly independent analysis of previous years and 2008 data be undertaken to actually determine the veracity of the data.

With that in mind, Valley watch contacted Dr. Mark Krahling, Analytic Chemical Professor with the University of Southern Indiana to see if his department would be willing to undertake such a study to determine the actual veracity of the data IDEM is using to support this petition. His response was generally positive and he is willing to open discussion as to how such a study could be done and how it would be funded.

In that regard, Valley Watch is willing to fund the first \$1000 of such a study if that would be matched by IDEM, the local EPA and/or the regional Chambers of Commerce.

Data gaps like we have uncovered are exceptionally germane to making such decisions as IDEM is proposing with this redesignation. Sound data is mandatory if we are ever going to improve the public health of citizens of this very polluted region.

## Ev - Mill Rd Fire Sta Particulate

Date	Hour (CST)	1 Hour ug/m3	24 Hour ug/m3
7/5/2007	13	6.7	20.8
7/5/2007	12	8.2	21.7
7/5/2007	11	13.5	22.2
7/5/2007	10	19.3	22.8
7/5/2007	9	11.8	23.4
7/5/2007	8	9.9	24.5
7/5/2007	7	9.5	25.6
7/5/2007	6	10.9	26.5
7/5/2007	5	16.6	27.0
7/5/2007	4	6.8	27.3
7/5/2007	3	3.8	28.2
7/5/2007	2	6.9	29.4
7/5/2007	1	3.6	30.7
7/5/2007	0	2.9	32.1
7/4/2007	23	2.3	33.7
7/4/2007	22	8.0	36.1
7/4/2007	21	100.0	38.8
7/4/2007	20	88.8	36.9
7/4/2007	19	52.5	35.0
7/4/2007	18	27.3	34.0
7/4/2007	17	21.1	34.1
7/4/2007	16	14.7	34.4
7/4/2007	15	27.0	35.2
7/4/2007	14	27.3	35.3
7/4/2007	13	26.9	35.3
7/4/2007	12	20.6	35.4
7/4/2007	11	27.5	35.8
7/4/2007	10	34.9	35.5
7/4/2007	9	37.4	34.9
7/4/2007	8	36.4	34.4
7/4/2007	7	31.1	33.9
7/4/2007	6	22.8	33.4
7/4/2007	5	24.4	33.0
7/4/2007	4	29.1	32.6
7/4/2007	3	31.5	31.9
7/4/2007	2	37.5	31.1
7/4/2007	1	38.1	30.0
7/4/2007	0	42.1	28.8
7/3/2007	23	59.4	27.5
7/3/2007	22	72.1	25.5
7/3/2007	21	54.6	22.9
7/3/2007	20	43.0	21.1
7/3/2007	19	28.2	19.8
7/3/2007	18	31.7	19.4
7/3/2007	17	22.4	19.0

## 2004 Missing PM Data

<b>U of E Dates Missing</b>	<b>Civic Center Data</b>	<b>Mill Road Data</b>
3/7/04	4.7	4.6
3/19/04	8.9	9.3
3/22/04	9	8.6
7/5/04	11.5	11.7

<b>Mill Road Dates Missing</b>	<b>Civic Center Data</b>	<b>U of E Data</b>
5/30/04	11	11.1
9/18/04	---	6
9/27/04	---	14.8

<b>Civic Center Dates Missing</b>	<b>U of E Data</b>	<b>Mill Road Data</b>
1/28/04	12.1	13
4/27/04	6.4	6.4
5/21/04	13.6	13.8
7/14/04	7.7	8
9/18/04	6	---
9/27/04	14.8	---
12/23/04	13.4	12.6
12/26/04	23.2	22.6

## 2005 Missing PM Data

<b>U of E Dates Missing</b>	<b>Civic Center Data</b>	<b>Mill Road Data</b>
5/25/05	6.7	6.5
5/28/05	7.7	9
5/31/05	16.6	14.7
6/3/05	17.6	16.4
6/6/05	15	14.7
6/9/05	10.7	11.6
6/12/05	8	7
6/15/05	7.5	7.6
6/27/05	43.2	43.4
12/6/05	19.3	21.2

<b>Civic Center Dates Missing</b>	<b>U of E Data</b>	<b>Mill Road Data</b>
3/26/05	28.5	28.9
3/29/05	11.4	9.9

<b>Mill Road Dates Missing</b>	<b>Civic Center Data</b>	<b>U of E Data</b>
3/14/05	16.2	17.4
8/11/05	24.4	25
8/17/05	26.1	25.6
9/1/05	16.2	15.6
9/19/05	20.4	20.5
10/13/05	25.8	24.5
10/16/05	8.3	9.6

# 2006 Missing PM Data

U of E Dates Missing	Civic Center Data	Mill Road Data
2/25/06	8.6	---
7/25/06	21.4	22.8
7/31/06	---	16

Mill Road Dates Missing	Civic Center Data	U of E Data
2/25/06	8.6	---
5/11/06	4.7	4.6
5/29/06	15.9	16.1
6/1/06	19.7	19.5
9/8/06	---	26.2
9/11/06	---	16.4
10/20/06	7.8	8.8
10/23/06	9.1	8.1
10/26/06	11.1	12.7
10/29/06	8.5	9.7
11/1/06	6.6	6.5

Civic Center Dates Missing	U of E Data	Mill Road Data
2/13/06	10.2	10.4
2/19/06	9.4	8.8
2/22/06	21.2	19.9
5/20/06	9.6	8.9
5/23/06	20.2	10.5
6/16/06	15.1	15
6/25/06	27.5	26.5
7/28/06	8.9	8.2
7/31/06	---	16
9/2/06	11	11.4
9/5/06	16.8	16.4
9/8/06	26.2	---
9/11/06	16.4	---
9/14/06	11.7	11.6
12/4/06	7.5	7.9
12/7/06	6.9	8.7

## 2007 Missing PM Data

<b>U of E Dates Missing</b>	<b>Civic Center Data</b>	<b>Mill Road Data</b>
6/26/07	16.8	---
7/14/07	15.5	13.9
8/1/07	34.4	31.1
9/6/07	33.6	24.6
9/9/07	15.1	11.7
11/23/07	7.6	8.7
12/8/07	21.1	19.7
12/11/07	10.2	10.8
12/23/07	3.4	3.3
12/26/07	14.3	11.4

<b>Mill Road Dates Missing</b>	<b>Civic Center Data</b>	<b>U of E Data</b>
2/14/07	7.9	7.1
2/17/07	14.8	15.2
2/20/07	10.8	9.9
5/18/07	7.8	8.8
5/21/07	15	14.9
6/26/07	16.8	---
10/15/07	---	15.5
10/24/07	5	4

<b>Civic Center Dates Missing</b>	<b>U of E Data</b>	<b>Mill Road Data</b>
4/6/07	5.8	6.7
4/18/07	11.2	11
4/21/07	19.7	19.3
5/24/07	25.8	23.9
5/27/07	27.7	29.9
6/2/07	22.3	19.8
6/5/07	8	7.7
6/11/07	16.5	17.2
6/14/07	31.5	28.2
6/17/07	29.6	29.1
6/23/07	20.2	20.6
7/8/07	26.2	23.4
8/4/07	30	28.8
8/7/07	18.2	18.3
8/10/07	11.1	11.5
8/13/07	24.7	25
8/16/07	25.2	24.4
10/15/07	15.5	---
10/30/07	17	14.1





IN REPLY REFER TO:

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Patoka River National Wildlife Refuge and Management Area

PO Box 217

510 ½ West Morton

Oakland City, Indiana 47660

Phone: 812/749-3199

Fax: 812/749-3059

March 26, 2008

Southwestern Indiana Area Fine Particle (PM<sub>2.5</sub>) Redesignation  
Petition and Maintenance Plan  
Scott Deloney, Chief  
Programs Branch  
Office of Air Quality MC 61-50  
100 North Senate Avenue  
Indiana Department of Environmental Management  
Indianapolis, Indiana 46206-2251

Dear Mr. Deloney,

I appreciate this opportunity to comment on the Indiana Department of Environmental Management's (IDEM) request to EPA to approve the Redesignation and Maintenance Plan for The Southwestern Indiana Area for Fine Particles (PM<sub>2.5</sub>).

IDEM is to be congratulated for putting together and analyzing a large volume of air quality information within the Redesignation proposal. I have reviewed the document and have many questions and concerns. It seems presumptuous at this time for IDEM to recommend that southwest Indiana be redesignated from nonattainment for fine particle matter pollution to attainment with maintenance.

It is my understanding that IDEM has until April, 2010 to meet the fine particle standard based on the State Implementation Plan due in April, 2008. This Plan identifies the current status of air quality along with demonstrated maintenance techniques that provide assurance of permanent and enforceable emissions reduction including consideration of new sources of fine particle emissions. Actual redesignation to attainment status in 2010 could then be based on 2007 – 2009 monitoring data which, if predictions are correct, should easily meet the attainment standard.

It is often said that if you have good health, you have everything. The healthy person in retirement or the child at home is a happy person who can enjoy life in many ways. There is indisputable proof that fine particulate matter pollution causes serious health problems and higher morbidity rates especially for the young, the old and those suffering from debilitating conditions such as cardio pulmonary disease. If IDEM errs in their predictions regarding permanent reductions of fine particulate matter, their error will be sure to cause pain, misery and suffering for some of the less fortunate people in our communities of southwest Indiana.

IDEM needs to acknowledge that health impacts resulting from fine particulate matter pollution also carries with it untold economic impacts related to lost time, unemployment, public assistance, increased medical costs and demands for more medical facilities.

Any decision by IDEM or EPA to lessen control and containment of fine particulate matter should grant every benefit of the doubt in favor of protecting the health and well being of the citizens of Indiana.

It is my hope that IDEM and EPA will delay this proposed redesignation.

It is too early to switch from nonattainment to attainment status for many reasons.

A review of data collected from the four monitors of record in Evansville and Jasper from 2000 through 2006 shows Vanderburgh and Dubois Counties were in violation of National Ambient Air Quality Standards (NAAQS) for fine particle matter five out of seven years.

It is a recognized fact that weather patterns varying from year to year are one of the most important factors that influence the development and transport of fine particles. Stagnant surface conditions any time of the year and upper air ridging provides conducive conditions for development and transport of fine particles. The Redesignation Plan points out on page 36 that nitrates are bigger contributors to fine particle concentrations in the winter and sulfates are bigger contributors to fine particle concentrations in the summer.

Appendix H of the Redesignation Plan shows data on sulfur dioxide emissions for all power plants in Indiana. From 2002 through 2006, 14 coal-fired plants showed increased emissions of sulfur dioxide by 136,963.87 tons while 21 coal-fired plants reduced sulfur dioxide emissions by 94,796.906 tons. This resulted in a net increase of 42,166.97 tons of sulfur dioxide emissions which is one of the primary contributors of fine particle pollution.

Purdue University's State Utility Forecasting Group predicts Indiana will need more than 10,600 additional megawatts of electricity by 2023. That means three new power plants the size of Gibson Generating Station, the third largest coal-fired plant in the world producing 3,250 megawatts. So, even with reductions in pollution emissions, the increase in the amount of coal used to meet projected power demands will mean additional pollution emissions.

We all need to recognize that southwest Indiana is situated in the Illinois Coal Basin and is blessed with rivers, large quantities of high sulfur coal and good transportation by rail, barge and trucks. These natural resources have resulted in a high concentration of coal-fired power plants. The tri-state area of southwest Indiana has the largest concentration of coal-fired power plants per given geographic area of anywhere on earth. We need to recognize that the extraction of coal, the transport of coal and the burning of coal have contributed greatly to the economy of southwestern Indiana with many jobs over the past century. There is a downside and that is our dirty airshed. To maintain acceptable standards of air quality means other polluting industries need to locate elsewhere.

IDEM's own modeling analyses of particle matter sources have proven that southwest Indiana is significantly impacted by regional transport of particulate matter and its precursors. A question that needs to be addressed in more detail is how successful can Indiana be in limiting fine particle emissions from adjoining States such as Kentucky and Illinois that also share in the wealth of natural resources?

As fuel prices continue to rise, the push for alternate fuels such as ethanol and biodiesel has led to a rush of construction of refineries and power plants to operate the refineries. To make it possible for these refineries to obtain their air pollution permit, EPA increased the allowable limit of fine particle emissions from 100 tons a year to 250 tons a year. Each new refinery will add new emissions to the existing airshed.

Has IDEM considered the real possibility that the high cost of home heating oil and natural gas will lead to many more people heating homes with wood? Wood smoke emissions will increase overall fine particle pollution.

In 2007, IDEM presented their 2008 Plan for Air Monitors across the State of Indiana. The Plan recommended an overall reduction of eight air monitor stations. After public outcry, three new stations were added in new locations for a net reduction of five air monitors. With the increased emphasis on energy production facilities, it seems like a poor time to be reducing the number of air monitors.

Stop to consider that most of the coal-fired power plants were constructed in a limited geographic area in the 1960's and 1970's for reasons listed earlier. In the past 40 to 50 years, these power plants have been burning coal and emitting nitrogen oxides, sulfur dioxides, fine solid particles of soot and mercury 365 days a year, 24 hours a day, every minute of every day. This is all occurring in a concentrated area and not dispersed widely like coal burning was prior to the advent of the large power plant era. We accept the pollution in this given area, in our backyards, in our fields, our forest and waters, everywhere in our daily lives, so we and others hundreds of miles removed can enjoy the benefits of electricity. While we breathe this contaminated air and the weak, sick, young and old suffer acute consequences, we should not allow ourselves and our offspring to be assaulted with even more fine particle pollution and chemical pollutants to meet the demands of a growing population and the incessant call for more growth for more jobs.

Can anyone really believe the claims in the Redesignation Plan that pollution control technology is going to reduce the overall amount of fine particle pollution to a level in compliance with NAAQS as called for by the Clean Air Act (CAA) especially in the next five years? Are we to believe that this never-before attained record-breaking effort to reduce fine particle pollution will be accomplished every year in our near future? It seems very unlikely.

Until we have more data that proves conclusively that southwest Indiana has the will, along with the financial and technical capability to keep our air clean enough despite what our neighboring States might add to our airshed, southwest Indiana should remain in nonattainment status at least until 2010. By then, more evidence will have been gathered to show proof that permanent improvements are making a real difference each and every year.

IDEM might consider additional air monitors to track the pathways of air flow from point sources like power plants as well as industrial, urban and high traffic areas.

Violations of air quality standards must be proven by data collected from real monitoring stations. Enforcement actions are impossible without hard data. Computer models can't do that.

Based on IDEM's figures for 2004, 2005 and 2006, southwest Indiana is barely meeting the average annual standard called for and one of those years, 2005, was in violation at all monitoring stations. It seems ironic that IDEM would point out on page 8 of the Redesignation Plan that "the elevated value in 2005 is considered an abnormal occurrence." Then, on page 9, under 4.0 Emissions Inventory, IDEM states "Indiana is using 2005 as the base year because it represents the center of the three-year design value." By using the high reading from 2005 for future comparisons, this will enable them to claim the fine particle matter level is not getting worse even though it might be at a level in violation of the NAAQS as it was in 2005.

One other issue that cannot be accounted for in future emissions from electric generating power plants is the fact that power plants can purchase pollution credits that will allow them to violate emission standards in southwest Indiana by buying credits elsewhere.

Another source of new pollution emissions planned for the area are Peaking Power Plants. As these new power plants come on line, they will qualify for air pollution permits based on annual levels of emissions even though they only come on line in the summer during peak demand periods for electricity. This will provide even more emissions at the worst possible time since the coal-fired plants would have been at maximum power output but unable to meet demand.

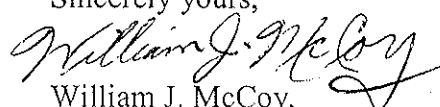
Another consideration not adequately addressed has to do with the "adequate margin of safety" Congress wrote into the CAA and directed EPA to demand as a protective margin for public health protection. This was in recognition of the real fact that high levels of fine particle matter set at 15 micrograms per cubic meter offers great harm to the health and well being of many people. So, what is the "margin of safety" level? According to the Plan, it appears future readings will be okay if it reaches the violation level of 2005.

Another issue that should perhaps justify delay of any approval action of the Redesignation Plan by the EPA, is the fact that EPA is being sued in federal court challenging the U.S. EPA's April 2007 regulations governing how states must conduct air quality planning to reduce fine particle pollution. The lawsuit claims that EPA's requirements are much weaker than those mandated by the CAA. The concern is that these lenient rules will allow life-threatening levels of air pollution to continue years longer than legally allowed. Should this lawsuit result in overturning EPA rules, any Redesignation and Maintenance Plan approved under these rules would be null and void. Just another good reason not to rush to judgment.

Patoka River National Wildlife Refuge is part of the National Wildlife Refuge System operated by the U.S. Fish and Wildlife Service (Service). Refuge lands have been acquired in the Nonattainment for Fine Particulate Matter designated areas of Pike and Gibson Counties. The Service is required by the CAA to preserve, protect and enhance air quality and air quality related values on Service lands. This includes visibility, flora, fauna, soil, water quality, cultural and historical resources and virtually all resources that are dependent upon and affected by air quality. As the Manager of this refuge, that is my responsibility.

Our vision is a Refuge System free of impacts from human-caused air pollution consistent with the Refuge System Improvement Act of 1997. This Act requires that: "the biological integrity, diversity and environmental health of the System are maintained."

Please consider delaying redesignation from nonattainment of PM 2.5 to attainment until 2010. The risks are too great until further evidence of permanent improvements has been gathered over the next two years.

Sincerely yours,  
  
William J. McCoy,  
Refuge Manager

cc: Ms Mary A. Gade  
Regional Administrator  
US EPA Region V  
77 West Jackson Blvd  
Chicago, IL 60604-3950

*The*



# *Evansville Audubon Society*

A CHAPTER OF THE NATIONAL AUDUBON SOCIETY

WESSELMAN PARK NATURE CENTER • 551 NORTH BOEKE ROAD • EVANSVILLE, INDIANA 47711

March 27, 2008

S.W. IN Area Fine Particle (PM2.5) Redesignation Petition & Maintenance Plan  
Scott Deloney, Chief, Programs Branch  
Office of Air Quality MC 61-50  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46206-2251

Subject: Draft Redesignation Petition and Maintenance Plan in Association with the Annual PM2.5 Standard for the Southwestern Indiana Area

Dear Mr. Deloney,

We at Evansville Audubon Society would like to express our concern about the proposal to redesignate Dubois, Vanderburgh, Warrick counties, as well as Montgomery Township in Gibson County, Ohio Township in Spencer County, and Washington Township in Pike County, as being in attainment of the national air quality standard for PM2.5 fine particulate air pollution.

Reports we have seen indicate that the area has been out of attainment for five out of the last eight years according to the EPA data. For the three years in which the data was in attainment, the average is essentially at the 15.0  $\mu\text{g}/\text{m}^3$  limit. During that period, monitors have exceeded the limit. It is also not clear how instrument accuracy, repeatability and precision were accounted for and if an error analysis was performed.

Further, the data from the new particulate monitor in Gibson county has not been taken into account. Historical data for Gibson county does not exist, yet much of the county is in the airshed of Duke Energy's Gibson Generating Station. Given prevailing southwesterly winds, pollution from this very large power plant would not normally register on monitors in Vanderburgh, Warrick and Posey counties. Thus, it appears that the fine particulate output of a very large emitter is not being considered in the proposal.

We also understand that there are proposals to construct five additional power generating facilities and five more ethanol refineries in the region. All of these will produce fine particulates subject to regulation under the PM2.5 requirements. If we are currently just at or possibly slightly below, depending upon instrument error and prevailing meteorological conditions, how can we responsibly declare attainment when we know that additional sources will be coming on line which will almost certainly push us back over the limit?

The proposal also does not appear to consider the effects of I-69. Given that the economic justification for the highway calls for a significant increase in area traffic, particularly large diesel trucks, how can we ignore the enormous input from this source?

Prior to the adoption of the  $15.0 \mu\text{g}/\text{m}^3$  limit, the EPA's Clean Air Scientific Advisory Committee recommended setting the fine particulate limit at  $14.0 \mu\text{g}/\text{m}^3$ . This was based on health data that indicated problems at levels below 15. We believe it is ill advised to designate attainment based upon marginally meeting a limit that many believe is too lax in the first place. We also understand that the American Lung Association and others have filed a lawsuit against the EPA on just this subject.

The EPA acknowledges that thousands of people die every year due to exposure to fine particulate air pollution and their own scientists have recommended more stringent requirements; yet IDEM is proposing to open up southwestern Indiana, already one of the most polluted parts of the state, to further pollution.

The Evansville Audubon Society is pleased that actions taken by Indiana, US EPA, and local industries have led to possible improvements in air quality; but in view of the above, we believe that it is premature to change the attainment status of the region. We urge IDEM to wait until 2010 in order to incorporate and evaluate new data from the Gibson county monitor, to determine if projected emission reductions actually happen, and to collect enough data from existing monitors to reliably say if there is a significant and continuing downward trend in PM<sub>2.5</sub> levels .

Sincerely,

A handwritten signature in cursive script, appearing to read "Sue Vernier".

Sue Vernier, Conservation Chair  
Evansville Audubon Society, Inc.

Pike Gibson Citizens for Quality Environment  
PO Box 92  
Oakland City In, 47660  
Pikeco.concernedresidents@yahoo.com

To Whom It May Concern,

Thank you for this opportunity to share our views on the Redesignation Plan proposed by IDEM. The purpose of this letter is to express my great concern for the health and safety of all citizens in Southern Indiana.

IDEM is reporting that the Evansville Metro Statistical Area, which includes Gibson, Posey, Vanderburgh, and Warrick Counties, is barely below the standard of 15.0  $\mu\text{g}/\text{m}^3$ . According to the 2008 Ambient Air Monitoring plan page 40 dictates that the highest site design value in an MSA is generally determined to be the design value for the area. Hence, Evansville's Annual Design Value in micrograms per cubic meter from 2004-2006 was 14.8  $\mu\text{g}/\text{m}^3$  barely under the 15.0  $\mu\text{g}/\text{m}^3$ . Additionally, Dubois County showed an average that only met the standard of 15.0  $\mu\text{g}/\text{m}^3$ . This is even more troubling when you look at appendix A of the redesignation plan. It shows that in 2005 all southwestern Indiana PM2.5 monitors show readings at or above 17.0  $\mu\text{g}/\text{m}^3$ . Additionally, this appendix illustrates that 5 of 8 years southwest Indiana has been above the standard; with 05 being the 2<sup>nd</sup> highest pm2.5 concentrations.

Additionally, the redesignation plan does not illustrate the impact of the following pending developments that affect our regional air shed:

<u>FACILITY</u>	<u>TYPE OF FACILITY</u>	<u>LOCATION</u>	<u>PROXIMITY TO VAND CO</u>
Cash Creek	640 MW gasification power plant	Henderson, Ky	Approx 20 miles
Duke Energy	640 MW gasification power plant	Edwardsport, In	Approx 44 miles
United Supply of America	270 MW coal fired power plant	Grayville, Il	Approx 30 miles
Illini Cropland & Energy	60 million/gal/yr Ethanol Refinery	Grayville, Il	Approx 30 miles
AS Alliance	100 million/gal/yr Ethanol Refinery	Mt. Vernon, In	Approx 15 miles
Aventine	226 million/gal/yr Ethanol Refinery	Mt. Vernon, In	Approx 10 miles
Abengoa Bioenergy	90 million/gal/yr Ethanol Refinery	Posey County, In	Approx 2 miles
The Ripatti Group	30 MW Pwr plant and 50 mil/gal/yr Ethanol Refinery co-location	Oakland City, In	Approx 25 miles
Vectren	100 MW Peaker power plant	Francisco, In	Approx 10 miles
CSX	Kings Rail Yard	Gibson Co, In	Approx 20 miles
Rockport Ethanol	200 million/gal/yr Ethanol Refinery	Rockport, In	Approx 32 miles
Indiana Gasification	Coal gasification facility	Rockport, In	Approx 32 miles
<b>COMPLETION OF</b>	<b>I 69 EXTENSION WILL BRING</b>	<b>17,000 SEMI'S</b>	<b>PER DAY!!</b>

We urge US EPA to consider these additional developments. As the redesignation plan shows the Evansville Metro Statistical Area is **barely** below the standard. With all of the additional polluting industry developing on our door step; it remains to be seen if our Communities will continue to maintain the standard for PM2.5 that we have barely attained. As this plan states, if attainment is granted it will be 8 years before non

Pike Gibson Citizens for Quality Environment  
PO Box 92  
Oakland City In, 47660  
Pikeco.concernedresidents@yahoo.com

attainment would be reassigned. If our region is getting this much development with so many counties currently in non-attainment; what will happen to our air shed if we remove our safe hold. Forbes magazine rated Indiana 49<sup>th</sup> out of 50 calling us one of the dirtiest in America. How can we expect to keep our families here or to bring in new residents to fill the jobs that we are trying to create with a reputation like that?

Our air quality will not only be compromised by the additional PM2.5 that is created from the Nitrogen Oxides and Volatile Organic Compounds that are spewed from the stacks of these facilities. We will see increased PM2.5 from the increase of diesel engines in semi and rail traffic. Trains and trucks will be idling for hours while loading and unloading fuel supplies, finished product, and industrial waste products. Currently, the permitting process does not require facilities to calculate how much PM2.5 is added to our air shed from these sources of pollution. Another fact that is not outlined in the IDEM plan is that the train locomotives have a very long serviceable life. Many in use today, especially small ones that move cars in rail yards and make local short runs, were built in the 1980's. Long before the day of emission controls to reduce particulates. The emission controls on trucks and equipment built after Feb. 2007 increases the cost by 7 to 10,000 dollars per truck. Therefore, most companies and independent owner-operators are electing to purchase trucks built prior to Feb 2007 that do not have the emission filters. Additionally, more and more companies are repowering their existing older trucks and equipment in order to save money. IDEM's redesignation plan assumes that because trucks and equipment built after Feb 2007 have the emission filters that our air quality will not be further compromised. However, in reality companies are trying to avoid the added expense to their bottom line. In time, these companies will be forced to use the emission filters; as their existing equipment will become impossible to get parts for and will eventually become completely unserviceable. However, this process will take much longer than what IDEM is anticipating. That reality is not outlined in the models set forth in the redesignation plan.

In January 2008, after much input from the public, IDEM added a PM2.5 monitor in Oakland City. The fact that there is a high concentration of existing coal-fired power plants polluting this never before monitored area is why this monitor was installed. Why add the monitor to our community if they already had plans to eliminate non attainment status for the region? Moreover, IDEM is recommending attainment for areas that have no monitors and have never been monitored. There are no PM2.5 monitors and no data for Pike, Gibson, Warrick, and Posey Counties. The air monitor in Oakland City was installed on Pike Gibson county line so that it could be representative of air quality of both counties; however the data is too new and was not included. Additionally, this monitor has been operational for 3 months and citizens have not been able to obtain readings from the monitor; as IDEM does not have the results online.

Another concern should attainment be granted, will IDEM's maintenance plan be enough to protect citizens? The redesignation plan fails to illustrate that the 2008 Ambient Air Monitoring plan reduced the total number of monitors throughout the state by 5. If



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IDEM continues with this trend then we will not have enough data to ensure public safety. Moreover, the maintenance plan outlined as part of the redsignation plan states that 2005 air data will be used as the baseline. The results from that year were called abnormal in the plan. Why would you use data that is considered to be abnormal as a baseline? Why would you use a baseline that was grossly over the standard. 2005 was the second highest pm2.5 concentrations in 8 years of collecting data. The 2005 pm2.5 average was 17.0.

IDEM's letterhead boasts the phrase, "We make Indiana a healthier place to live." We need to remind IDEM of their role. We know that there is much political pressure for economic development, however that is not IDEM's responsibility. As citizens, we rely on them to protect us. Moreover, according to Mitch Daniels, Indiana currently has its lowest unemployment rate in 6 years. In an article titled, "Economy in top shape, Daniels says" published March 21, 2008 in the Evansville Courier, Gov Daniels was quoted as saying, "We've got tens of thousands of more jobs in this state than we did a few years ago." Doesn't sound like we desperately need all the economic development.

It is also important to note that the PGCQE supports the 2006 position of the Union of Concerned Scientists that the average annual standard currently established by EPA at 15 micrograms still is not low enough to protect human health. The Clean Air Scientific Advisory Committee had reported to EPA that scientific data showed that in order to protect citizens that the annual average level should be set between 13 and 14 micrograms. ([http://www.ucsusa.org/scientific\\_integrity/interference/epa-particulate-matter.html](http://www.ucsusa.org/scientific_integrity/interference/epa-particulate-matter.html)). If the EPA would have set the annual average standard where the CASAC had recommended we would not even be close to attainment. In 2006 EPA funded a study that was published in the March 2006 Journal of the American Medical Association. It showed that exposure level of 13.4 micrograms of PM2.5 would put 11.5 million elderly Americans at increased risk of cardiovascular and respiratory disease. That level is 1.6 lower than our level of 15. More than 165 million people live in areas where the PM2.5 levels are above the recommended standard. How is this protecting us?

The redesignation plan is projecting lower levels of sulphur dioxides despite the fact sulphur dioxide emissions from power plants have been increasing since 2002. From 2003-2006 our sulphur dioxide emissions from power plants are exceeding 800,000 tons. 2006 showed a very slight decrease from 2005; yet it still did not get back to our lowest reading in 2002 of just below 800,000 tons. Sulphur dioxide undergoes chemical reactions in the air; these reactions produce sulphuric acid and Sulphate salts. Sulphate salts contribute to the formation of respirable particulate matter (PM2.5) in the air. IDEM is claiming that power plant modifications will improve these numbers. However most of the modifications will not take place until 2008. Additionally, once better technology is in force the industries will be able to increase their production and still be within the parameters of their permits. Therefore, there is no concrete data to show if indeed these levels are in fact reduced by the amounts forecast.

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It is too premature to redesignate to attainment. On June 25, 2007, The Sierra Club and The American Lung Association filed a lawsuit against the EPA for not holding individual states up to the mandates set forth in the Clean Air Act. The basis for their lawsuit states that EPA requirements are much weaker than those mandated in the Clean Air Act and would allow life threatening levels of air pollution to continue years longer than legally allowed. This is exactly the issue we are dealing with today. The validity of the EPA guidelines is currently under litigation. The debate over attainment or non-attainment should be postponed until after this litigation is over and the validity of the EPA guidelines are reviewed. Let's talk about this again in 2011. Let's see if the trends and forecasts in the redesignation plan become a reality and let's see if the EPA guidelines are upheld or overturned.

We all need to ask ourselves- What is at stake here? The answer is the health and safety of our citizens. A study from American Lung Association titled, "New Studies Confirm that Current Levels of Particulate Air Pollution are Harmful to Human Health" illustrates the following statistics:

- Chronic exposure to particulate pollution shortens lives by 1 to 3 years
- People with pre existing cardiac or respiratory conditions have higher than average risk of death from exposure to particles
- Particulate air pollution is linked to heart rate variability, a risk for heart attacks. It also found that a heart patients; vulnerability to potentially fatal arrhythmias increases after exposure to air pollution. This is of particular concern when you look at the American Heart Association statistics that tell us that 40.1% of the deaths in Pike County and 37.99% of the deaths in Gibson Counties are the result of cardiovascular diseases.

The EPA's website outlines the health effects of PM2.5 as:

- Aggravated asthma
- Increase in respiratory symptoms like wheezing, coughing, and difficult or painful breathing
- Chronic bronchitis
- Decreased lung function
- Premature death
- EPA estimates that 20,000 people die per year as a result of PM2.5 pollution.

Please help us protect our quality of life!!

Sincerely,

Nat Beck  
President PGCQE

Sincerely,

Shannon L Lewis  
Vice President PGCQE

Pike Gibson Citizens for Quality Environment  
PO Box 92  
Oakland City In, 47660  
Pikeco.concernedresidents@yahoo.com

To Whom It May Concern,

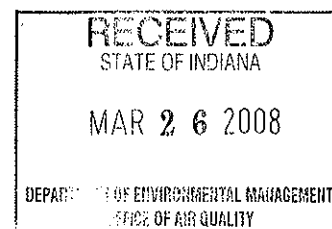
The purpose of this letter is to express my great concern for the health and safety of all citizens in Southern Indiana. Currently IDEM is petitioning US EPA recommending that all of Southern Indiana be removed from non attainment status for Fine Particulate pollution.

IDEM is reporting that the Evansville Metro Statistical Area, which includes Gibson, Posey, Vanderburgh, and Warrick Counties, is barely below the standard of 15.0  $\mu\text{g}/\text{m}^3$ . According to the 2008 Ambient Air Monitoring plan page 40 dictates that the highest site design value in an MSA is generally determined to be the design value for the area. Hence, Evansville's Annual Design Value in micrograms per cubic meter from 2004-2006 was 14.8  $\mu\text{g}/\text{m}^3$  barely under the 15.0  $\mu\text{g}/\text{m}^3$ . Additionally, Dubois County showed an average that only met the standard of 15.0  $\mu\text{g}/\text{m}^3$ . This is even more troubling when you look at appendix A of the redesignation plan. It shows that in 2005 all southwestern Indiana PM<sub>2.5</sub> monitors show readings at or above 17.0  $\mu\text{g}/\text{m}^3$ . Additionally, this appendix illustrates that 5 of 8 years southwest Indiana has been above the standard; with 05 being the 2<sup>nd</sup> highest pm<sub>2.5</sub> concentrations.

Additionally, the redesignation plan does not illustrate the impact of the following pending developments that affect our regional air shed:

<u>FACILITY</u>	<u>TYPE OF FACILITY</u>	<u>LOCATION</u>	<u>PROXIMITY TO VAND CO</u>
Cash Creek	640 MW gasification power plant	Henderson, Ky	<b>Approx 20 miles</b>
Duke Energy	640 MW gasification power plant	Edwardsport, In	<b>Approx 44 miles</b>
United Supply of America	270 MW coal fired power plant	Grayville, Il	<b>Approx 30 miles</b>
Illini Cropland & Energy	60 million/gal/yr Ethanol Refinery	Grayville, Il	<b>Approx 30 miles</b>
AS Alliance	100 million/gal/yr Ethanol Refinery	Mt. Vernon, In	<b>Approx 15 miles</b>
Aventine	226 million/gal/yr Ethanol Refinery	Mt. Vernon, In	<b>Approx 10 miles</b>
Abengoa Bioenergy	90 million/gal/yr Ethanol Refinery	Posey County, In	<b>Approx 2 miles</b>
The Ripatti Group	30 MW Pwr plant and 50 mil/gal/yr Ethanol Refinery co-location	Oakland City, In	<b>Approx 25 miles</b>
Vectren	100 MW Peaker power plant	Francisco, In	<b>Approx 10 miles</b>
CSX	Kings Rail Yard	Gibson Co, In	<b>Approx 20 miles</b>
<b>COMPLETION OF</b>	<b>I 69 EXTENSION WILL BRING</b>	<b>HUGE</b>	<b>DEVELOPMENT!!</b>

We urge US EPA to consider these additional developments. As the redesignation plan shows the Evansville Metro Statistical Area is **barely** below the standard. With all of the additional polluting industry developing on our door step; it remains to be seen if our communities will continue to maintain the standard for PM<sub>2.5</sub> that we have barely attained.



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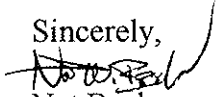
Our air quality will not only be compromised by the additional PM2.5 that is created from the Nitrogen Oxides and Volatile Organic Compounds that are spewed from the stacks of these facilities. We will see increased PM2.5 from the increase of diesel engines in semi and rail traffic. Trains and trucks will be idling for hours while loading and unloading fuel supplies, finished product, and industrial waste products. Currently, the permitting process does not require facilities to calculate how much PM2.5 is added to our air shed from these sources of pollution.

In January 2008, after much input from the public, IDEM added a PM2.5 monitor in Oakland City. The fact that there is a high concentration of existing coal-fired power plants polluting this never before monitored area is why this monitor was installed. Why add the monitor to our community if they already had plans to eliminate non attainment status for the region? Moreover, IDEM is recommending attainment for areas that have no monitors and have never been monitored. There are no PM2.5 monitors and no data for Pike, Gibson, Warrick, and Posey Counties. The air monitor in Oakland City was installed on Pike Gibson county line so that it could be representative of air quality of both counties; however the data is too new and was not included. Additionally, this monitor has been operational for 3 months and citizens have not been able to obtain readings from the monitor; as IDEM does not have the results online.

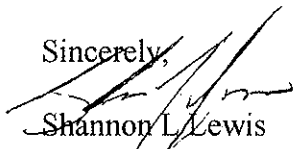
Another concern should attainment be granted, will IDEM's maintenance plan be enough to protect citizens? The redesignation plan fails to illustrate that the 2008 Ambient Air Monitoring plan reduced the total number of monitors throughout the state. If IDEM continues with this trend then we will not have enough data to ensure public safety.

We urge US EPA to consider all of this incoming development to our local communities. As this plan states, if attainment is granted it will be 8 years before non attainment would be reassigned. If our region is getting this much development with so many counties currently in non-attainment; what will happen to our air shed if we remove our safe hold. Forbes magazine rated Indiana 49<sup>th</sup> out of 50 calling us one of the dirtiest in America. How can we expect to keep our families here or to bring in new residents to fill the jobs that we are trying to create with a reputation like that?

Sincerely,

  
Nat Beck  
President PGCQE

Sincerely,

  
Shannon L. Lewis  
Vice President PGCQE

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels

The IDEM letter head on the website reads "We make Indiana a cleaner healthier place to live". Idem is proposing to remove Dubois, Vanderburgh, Warrick counties, and parts of Gibson, Pike, and Spencer counties from the current non attainment status. With all of the coal fired power plants in this area currently, and several more polluting industries proposed, and being built here now. How could the redesignation of S.W. Indiana into attainment make this a cleaner healthier place to live? 2 out of the last 7 years, the counties with monitors, were under the standards. What evidence is there to show that the counties without monitors were compliant with the current regulations?

Under section 107 of the clean air act, according to IDEM's website, it states specific requirements to be met in order for an area to be considered for redesignation including:

A). A determination that the area has attained the annual standard for fine particles. (It reads the very same thing for the 8 hr. Ozone standard.) With the new Ozone standards in effect, Both Vanderburgh and Warrick counties were over the standard from 2005 to 2007. How can you Argue for pm2.5 and ~~not~~ ~~16NDNE~~ Ozone?

Also under section 107 letter C.

C). A determination that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the State Implementation Plan (SIP) and other federal requirements.

If that is so than Idem has determined exactly where the pollution in this area is coming from.

Where can a report on these findings be located, and what measures have been taken to permanently reduce the pm2.5 and ozone?

Also on the Idem website it reads "fine particles 2.5 microns or smaller, have been signaled out as those responsible for many adverse respiratory problems."

(3<sup>rd</sup> paragraph, page one, of the executive summary, from the document titled Past, Present, and Future, the National Ambient Air Quality Standards for Ozone and Particulate matter.)

Everyone is concerned about the Economic Development of Indiana. But if IDEM relaxes on the Environmental standards, It will be inviting more polluting industry, to an already saturated State.

Enforce the standards already in place, and maybe some cleaner industries will be attracted to the area.

Nobody wants to put a flower shop next to a hog farm! 2 OF THE LAST 7 YEARS ISN'T CONCLUSIVE ENOUGH TO REMOVE THE NON ATTAINMENT STATUS

Nat Beck

President, Pike Gibson Citizens for Quality Environment

1423 W. Co. Rd. 525 S.

Oakland City, In. 47660

POLLUTION KNOWS NO BOUNDARIES, WHETHER IT BE STATE LINES, COUNTY LINES, OR TOWNSHIPS.

ACCORDING TO YOUR OPENING STATEMENT, 3 COMPLETE YEARS OF DATA IS NEEDED BEFORE REDESIGNATION CAN OCCUR.

~~8 YEARS IS NEEDED~~

I UNDERSTAND DATA IS MISSING FROM THE REPORTS.



720 S 1300 E  
Oakland City, IN 47660  
March 27, 2008

Indiana Department of Environmental Management  
Scott Deloney, Chief  
Programs Branch  
Office of Air Quality MC 61-50  
100 North Senate Avenue  
Indianapolis, IN 46206

Dear Mr. Deloney,

IDEM's proposal to redesignate fine particle matter pollution from nonattainment to attainment status in Southern Indiana is premature and great cause for concern among those of us who live in the affected area. By lowering the standards for clean air, IDEM, whose mission is to create a healthier environment for our citizens, is disregarding the health and welfare of the people they are charged to protect.

The EPA has recently lowered the standard of fine particulate matter it allows ethanol refineries to spew out. The level has increased from 100 to 250 tons of fine particulate matter per year. This transparent action promotes industry at the expense of the health of our people. Especially vulnerable are children, the elderly, and those who are already affected by respiratory illnesses.

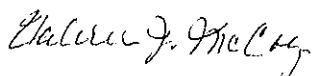
Southern Indiana boasts one of the largest coal burning power plants in the world. There are many other plants in southern Indiana as well as in upwind locations in Kentucky and Illinois. Studies have shown that in the next 20 years, we will need additional (huge) plants to generate as much as 10,600 megawatts of power to satisfy the projected demand for electricity. With new plants will come increased pollution.

The claim will certainly be made that new technology will limit air pollution to acceptable levels. That will just not be true. If you look towards any of the plants presently in operation, on a clear day, you will see deep layers of pollution stretching almost as far as the eye can see. No reasonable person could believe that this pall is not dangerous or has no effect on the people who are breathing it. To allow even more fine particulate emissions to be released into the air is unconscionable.

At the very least, going forward, please continue to gather and analyze data from the few air monitors that are now in place. If, after two or three years of data collection, there is legitimate proof that air quality is improving and well below nonattainment levels, at that time it would be reasonable and responsible to revisit this issue.

I respectfully request that IDEM not redesignate southern Indiana from nonattainment to attainment status regarding fine particulate emissions.

Sincerely,



Valerie J. McCoy





Public Comment for  
Public Hearing on Southwestern Indiana Request for Redesignation and Maintenance  
Plan for Annual Fine Particles  
March 27, 2008  
Evansville Vanderburgh Public Library, McCollough Branch, 5:30PM-9PM

Submitted by:  
Christine Belt  
1209 SE 2<sup>nd</sup> ST  
Evansville, IN 47713

Thank you for the opportunity to submit my comments today.

According to the EPA's website:

Health studies have shown a significant association between exposure to fine particles and premature death from heart or lung disease. Fine particles can aggravate heart and lung diseases and have been linked to effects such as: cardiovascular symptoms; cardiac arrhythmias; heart attacks; respiratory symptoms; asthma attacks; and bronchitis. These effects can result in increased hospital admissions, emergency room visits, absences from school or work, and restricted activity days.

I can personally account for these severe adverse health effects, because I suffered a severe respiratory allergic attack as a direct result of exposure to high Particulate Matter 2.5 concentrations. I have never experienced a severe respiratory allergic attack before—that is, until 2007.

From the Evansville Courier and Press:

The Evansville Environmental Protection Agency and the Vanderburgh County Health Department Ozone Office has issued a Particulate Alert for Tuesday, May 29 and Wednesday, May 30, 2007. It is possible that the level of Particulate Matter 2.5 micrometers in diameter (PM<sub>2.5</sub>) may reach a 24 hour average of 35 micrograms per cubic meter (35µg/m<sup>3</sup>).

Unfortunately for me, this Particulate Alert came two days too late. I am an avid gardener and love being outdoors. As I recall, I had worked outside in my vegetable and flower gardens on the weekend of May 27, 2007. After working outdoors, I became quite ill with difficulty breathing and other respiratory problems. I presented to my physician; he told me I had suffered a severe upper respiratory allergy attack, and then prescribed a series of steroids and medications used by asthma patients.

I found this very troubling—for one, I had never experienced severe respiratory problems until moving to the Evansville area. I am a non-smoker, and had always been relatively healthy and active. Now I needed to take steroids and asthma medications to recover from simply being outdoors.

I later discovered, according to the monitoring data available, PM2.5 concentrations on May 27, 2007, were 27.7 to 29.9 micrograms per cubic meter. (Incidentally, the 29.9 micrograms per cubic meter Mill Road monitor reading was not listed in the monitor information provided by the Vanderburgh Co. Health Dept.). As to why the Mill Road monitor's higher reading was left out of the information provided can only be left to conjecture.

According to an article in the Evansville Courier and Press, (<http://www.courierpress.com/news/2008/mar/10/city-worries-about-air-alert-increase/>), in 2007, the EPA issued 24 Air Quality Alerts for our area. I wonder how many Air Quality Alerts were not issued because monitor data was not being tracked nor recorded. In any case, alerts are issued because there is a severe health risk—PM2.5 gets deep in the lungs where it can't easily be expelled and can lead to respiratory problems, heart disease and heart attacks. When particulate levels reach dangerous proportions, the health department is obligated to protect public health.

I deeply hope that the Health Dept and the EPA continue to take this health matter seriously and continue to issue Air Quality Alerts when necessary to protect the public—I do not want to experience another respiratory attack like I had last year; since the PM2.5 matter is now deeply in my lungs, I'm afraid if there is a next time, the attack will be even more serious in nature. The general public needs to know when they need to take extra measures to protect themselves from this dangerous particulate matter.

I ask the EPA to take into account the monitoring data as it stands, but also consider the monitoring data is incomplete and when all data sources are considered, our area is in non-attainment for PM2.5 according to the EPA's standards.

Thank you again for your consideration.

In a small way, I have enjoyed the benefits of the American lifestyle for almost 70 years. I have burned thousands of gallons of gasoline traveling the highway system, thousand of gallons of fuel oil and natural gas have kept me warm and tons of coal has provided me with electric power. I will also admit that I have worked at some jobs in the last fifty years that created pollution. I am not going to be a hypocrite and say no one else should also enjoy the lifestyle that America provides for its citizens.

In fifty years, nearly everything has gone up ten times except my income. Many seniors can barely survive from one month to another and any economic benefits of being in compliance with I.D.E.M.'s rules have little appeal for us.

If I have learned anything in life, it is that nothing is as valuable and precious as good health, which I still cling to. To sacrifice health on the altar of economic prosperity is a shortsighted, foolish tradeoff. When the good jobs and limited resources are gone, as they will be someday, and all you have to show for the money are sickly people and tombstones, who will be left to say that the sacrifice was worth it?

Any action that is taken that has the potential to threaten my health or anyone else's; I will fight to my last gasping breath.

If government action is needed, it should target these concepts: encourage utilities to reward lower consumption and develop new, clean methods of providing energy; help industries develop new processes to reduce waste and pollutants and conserve material; promote conservation methods for all consumers; and finally, consider concepts of discouraging population growth and urban sprawl.

It is so simple in the big picture: no people - no pollution; many people - much pollution. The earth has ways of compensating for mankind's foolishness.

I strongly urge that no change in status be made for at least two more years to see if the current downward trend toward compliance levels continues to reduce the levels of pollution below the magic number of 15.

Bob Zasadny  
219 S. Main Street  
Oakland City, IN 47660  
Telephone (812) 385-6705



March 27, 2008

S.W. IN Area Fine Particle (PM<sub>2.5</sub>) Redesignation Petition & Maintenance Plan  
Scott Deloney, Chief, Programs Branch  
Office of Air Quality MC 61-50  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46206-2251

Subject: Draft Redesignation Petition and Maintenance Plan in Association with the Annual PM<sub>2.5</sub> Standard for the Southwestern Indiana Area

Dear Mr. Deloney,

As a resident of Gibson County, I would like to express my concern about IDEM's proposal to redesignate parts of southwestern Indiana, including Gibson County as being in attainment with the national air quality standard for PM<sub>2.5</sub> fine particulate air pollution.

As I understand it, the EPA's monitor data shows that parts of Evansville have been out of attainment for at least five of the last eight years and during the last three years were essentially right at the limit. Further, no data is available for Gibson county as we have only just established a monitor for the county.

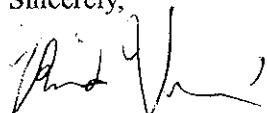
I also understand that additional power stations and ethanol refineries are planned for the region, plus there will be a substantial increase in transport related emissions if I69 is built through the area as its backers insist it will. These will add pollutants, which if not offset by decreases elsewhere, will probably push the area back into non-attainment. I could find nothing in the "Request for Redesignation and Maintenance" plan to indicate that I69 had been taken into account and if so, what assumptions had been made.

In reading through the rationalization for the redesignation, I see a heavy reliance on reductions in pollutant output expected from improvements in technology and compliance to regulations. Should these improvements be delayed due to technical problems or waived due to political pressure, we could expect to be well above the present 15.0 µg/m<sup>3</sup> limit.

As someone who has been through having both parents suffer with lung disease and eventually succumb to lung cancer, I am particularly aware of the terrible nature of lung diseases. I understand that the EPA's own scientists have recommended a more stringent limit than 15.0 µg/m<sup>3</sup> as evidence indicated that significant health issues were observed at levels below that.

Given these considerations, I request that IDEM not proceed with redesignation at this time and instead wait until 2010 when data from the Gibson county monitor has been available for several years and additional data has been collected from the Evansville monitors to confirm that the measured pollutant reductions are real and that the source reductions are continuing.

Sincerely,



Richard Vernier  
580 N 350 E  
Princeton, IN 47670



March 27, 2008

The principal issue being debated today is the level of particulates emissions in the lower Ohio Valley of IN. It is clear that the present level is essentially at the max permissible, under law. To investigate the consequences of particulates emissions, I have launched a web search, and contacted some leading scientists in the state of IN. My findings follow.

Dr. Stephen Jay, Chair, Department of Public Health, IU School of Medicine said in Sept 2006 to the IN state legislature that "As a result of fine particle pollution, the costs associated with premature mortality, illness, and lost productivity in IN exceed 5 billion dollars each year." About 2 weeks ago, I phoned him and asked if he felt that his figures in 2006 given to the state legislature were still relevant, and he relied affirmatively.

Let us now examine the effectiveness of removing particulates. In 2005, Prof. Kristin Shrader-Frechette, and endowed professor at Notre Dame in the biological sciences, wrote that "Compared to a coal plant, the US DOE correctly says that a "clean coal" gasification plant emits only 65% --about 50,000 tons annually.... Particulates cause cancer, heart attacks, asthma, and other ailments. 2004 data from the National Cancer Institute show that every 0.000001 gram increase in particulates --a few millionths of a gram--causes an 18% increase in heart attack fatalities."

The point to be made from the preceding citations is that it appears probable that even a small increase in removal of particulates would be highly cost effective. If IN is to use coal in the future, why can't it at least be economically responsible, and do so in a manner not detrimental to our health? I point out that doing so would particularly have a major impact on improving health on local citizens. Dr. Jay informed me that the particulate problem lies mainly within 30 miles of the emitting coal plant. So, we here in Ohio Valley are paying much of the price for our dirty plants. Why must we continue to do so?

And by the way, Forbes magazine, which is a pro-business publication, has ranked IN to be 49<sup>th</sup> out of 50, as a polluting state. Next to the absolute bottom. Quite a distinction to be ashamed of, wouldn't you say? In summary, the Ohio Valley in the local area is an open sewer for air pollution, and I suspect everyone in this room knows so.

Stephen Obermeier  
PhD, Purdue University, Civil Engineering/Geology

3415 W CR RD 50 N  
Rockport, IN 47635  
Tel. no. 812-649-4474.





March 27, 2008

Hello, my name is Pauline Singer and I am pleased to have the opportunity to voice the concerns I have with IDEM's Redesignation Plan. I feel that IDEM has overlooked several important factors in determining that now is the time to place the S.W. portions of Indiana that are currently in non-attainment into attainment. I would like to point out these vital factors. #1 being the fact that the data IDEM is using to justify this redesignation clearly shows that out of the previous 8 years, 5 of those years' data showed that these areas of non-attainment had **above normal** readings of PM2.5. And the data also shows that in 2005, the fine particulate matter levels got as high as **17%!** Health experts recommend a level of no higher than 14% to be safe. The year 2005 was one of the **worst** years on record for high levels of PM2.5.

IDEM **failed miserably** to protect the health and well-being of Indiana citizens. Where are the permanent improvements that IDEM claims to have put in place? And how can the citizens of Indiana put their trust and faith in IDEM when IDEM is going to use 2005's data as a guide to predict future air quality? Any PM2.5 levels below 2005's will look better, right? IDEM should be **making certain** they obtain readings of 14% PM2.5, or less, not settle for anything below 2005's PM2.5 levels of 17%.

Another very important factor that IDEM is not considering is **new source pollution**. In my area of S.W. Indiana, I know of at least 10 possible sources that I think should be considered. These new sources of pollution include power plants, ethanol plants, railroad yards, and let's not forget the construction of I-69 that will start soon. I would like to emphasize the fact that in a 60 mile radius of my home there are **seventeen** coal fired power plants!

I have **no** reason to believe that IDEM will make Indiana a cleaner, healthier place to live, as the logo on their letterhead claims. I place **none** of my faith in IDEM to keep the air that my family breathes clean. I believe IDEM should be **discouraging** any possible air polluting industries, not encouraging them, when in fact, that's exactly what they will be accomplishing if the Redesignation Plan is adopted.

Another important factor that IDEM has failed to consider is the weather. As we all know, weather has a huge impact on PM2.5. I would like to mention that I am aware of the Federal Lawsuit filed against the EPA by not only the American Lung Association, but the Sierra Club and Clean Air Advocates as well. I really do wish my area **was** in attainment. I request that IDEM post-pone their Redesignation

Plan. I believe, when you thoroughly take into account **all** possible factors, it is too early to predict with complete accuracy, that the non-attainment areas will be in attainment.

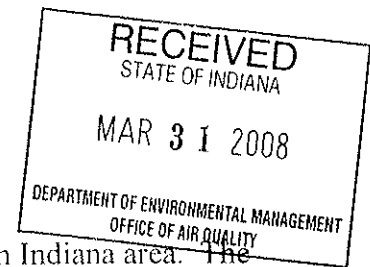
Please, during your decision making process, stop and take a moment to consider those citizens that will be the most affected by your actions. Those most **adversely** affected will be our children, the elderly population, and people with chronic health conditions like asthma, and respiratory diseases. The decision you make will have a **major** impact on all the citizens of Indiana. The health and well-being of all Indiana citizens is in your hands. **Now** is the time to show us that you can act responsibly and do what's right to protect us from harmful air pollution. You owe it to the citizens of Indiana and yourselves, please don't make this decision in haste. I would like to see the quality of life improve here in our state, not worsen under your supervision.

Pauline Singer

Member of PGCQE

Pike/Gibson Citizens for Quality Environment

To Whom It May Concern:



I am opposed to removing the non attainment status from the Southern Indiana area. The monitoring data shows that air standards have only been met 2 out of the last 7 years. Currently, there is a lot of Industry being developed near Vanderburgh County. The redesignation plan by IDEM **does not** illustrate how these developing, potential polluters will affect the air shed that they are recommending for attainment. The proposed developments include, but are not limited to, 5 power plants and 5 ethanol refineries. They are developing in Posey, Gibson, Pike counties in Indiana, Henderson County, KY, and White County, IL. Additionally, I69 extension will bring the opportunity for major industrial development that we can not calculate. Currently, Warrick County is constructing an Industrial Park near the I69 route to attract industry between I69 and I-164. Pike County is contemplating a similar venture near the I69 route in their county.

It is too soon to remove the non attainment status. 2005 was one of the worst years of record, with readings exceeding 17.0. It was the 2<sup>nd</sup> highest readings in 7 years of monitoring. It is also important to note that Vanderburgh County readings met the standard by only .2 margins in 2006; while Dubois had a zero margin with PM2.5 monitor readings at exactly the 15.0 standard. There are too many speculations and assumptions in this plan.

The only thing accomplished with attainment status is to open the flood gates for polluting Industrial Development. It is a medically proven fact, that our children in Southern Indiana have huge rates of asthma. For their sake, don't let our children pay the ultimate price for all of the political pressure for Economic Development.

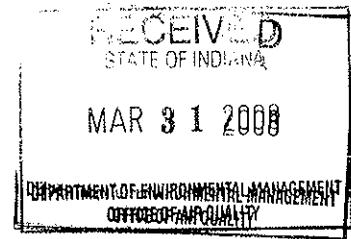
**Please help protect the Quality of Life in our state.**

Sincerely,

*Pauline Singer*



Scott Deloney, Chief  
Programs Branch  
Office of Air Quality MC61-50  
100 N. Senate Ave  
Indiana Department of Environmental Management  
Indianapolis, IN 46206-2251



Dear Mr. Deloney,

I am opposed to removing the non attainment status from the Southern Indiana area. The monitoring data shows that the air standards have only been met 2 out of the last 7 years. Currently, there is a lot of industry being developed near Vanderburgh County. The re-designation plan by IDEM does NOT illustrate how these developing, potential polluters will affect the air shed that they are not limited to, 5 power plants and 5 ethanol refineries. They are developing in Posey, Gibson, Pike counties in Indiana, Henderson County, KY and White County, IL. Additionally, I69 route to attract industry between I69 and I-164. Pike County is contemplating a similar venture near the I69 route in their county.

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Please help protect the Quality of Life in our state.

Sincerely,



RECEIVED  
STATE OF INDIANA

APR 3 2008

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY

To Whom It May Concern:

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**Please help protect the Quality of Life in our state.**

Sincerely,







## SEALS, SHAWN

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**From:** DELONEY, SCOTT  
**Int:** Thursday, March 20, 2008 3:06 PM  
**To:** SEALS, SHAWN  
**Subject:** FW: Air Quality Non - Attainment Status

**Follow Up Flag:** Follow up  
**Flag Status:** Red

-----Original Message-----

**From:** Lengerich, Steve  
**Sent:** Thursday, March 20, 2008 2:18 PM  
**To:** DELONEY, SCOTT  
**Subject:** FW: Air Quality Non - Attainment Status

Scott,  
I think this is directed to the nonattainment hearings and comments. You may have gotten this also.  
Steve

-----Original Message-----

**From:** jed beadles [mailto:jedbeadles@hotmail.com]  
**Sent:** Monday, March 17, 2008 11:32 AM  
**To:** Lengerich, Steve; Crooks, Dave; Young, Richard  
**Subject:** Air Quality Non - Attainment Status

Whom It May Concern:

I am opposed to removing the non attainment status from the Southern Indiana area. The monitoring data shows that the region is barely meeting the US EPA standards for PM 2.5. Currently Southern Indiana has many Industrial Development projects being developed. The redesignation plan by IDEM does not illustrate how these developing potential polluters will affect the air shed that they are recommending for attainment status. The proposed developments include, but are not limited to, 5 power plants and 5 ethanol refineries. They are developing in Posey, Gibson, Pike counties in Indiana, Henderson County, KY, and White County, IL. Additionally, I69 extension will bring the opportunity for major industrial development that we can not calculate. Currently, Warrick County is planning an Industrial Park near the I69 route to attract industry between I69 and I - 164. Pike County is contemplating a similar venture near the I69 route in their county.

Bottom line is that we are barely meeting the 15.0 standard set by USEPA. The only thing accomplished with attainment status is to open the flood gates for polluting industrial development. Most commonly referred to by politicians as Economic Development. We need jobs; but not at the cost of the health and well being of our citizens.

I feel it is too soon to remove the non attainment status until after all the facilities are built and operational. In 3 years if we are still under the 15.0 standard, and trending speculations set for in the plan are in fact reality, then we will welcome attainment. The most important thing for our families and children is our quality of life. It is medically proven that our children have huge rates of asthma. For their sake, 3 more years of real, factual data could save their life.

Sincerely,

Jed Beadles

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Helping your favorite cause is as easy as instant messaging. You IM, we give.  
[http://im.live.com/Messenger/IM/Home/?source=text\\_hotmail\\_join](http://im.live.com/Messenger/IM/Home/?source=text_hotmail_join)

## To Whom It May Concern:

- You (IDEM) are proposing for the removal of air monitors from areas that have previously shown air quality of nonattainment status, but now reveal a reduction of particulate matter to a level at or slightly below danger zones. Your proposal also states that if these monitors are removed, it would be for an eight (8) year period.
- Any reduction of pollution is a positive, favorable trend, but this reduction is over a very short time span, and we therefore think this a premature move on your part.

### \*\*\* REASONS: 3 —

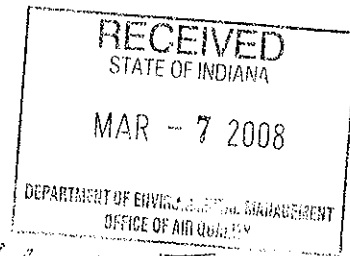
- 1) Indiana ranks 49<sup>th</sup> in air quality. Your claim is that air quality has improved somewhat in two of the last three years, however miniscule. If you are at the bottom of the list concerning air quality, which way could you go but up? Any reduction would be an improvement!
- 2) We have the highest concentration of fossil fuel fired power-plants in the world! We have 17 within a sixty-two mile radius of this area, with four more proposed at this time, plus ten or so proposed industries moving in if air quality restrictions are removed. Plus, with I-69 coming, bringing 17,000 diesel trucks daily, even if we are presently borderline concerning air quality attainment, that level will only increase significantly.
- 3) IDEM's claim of pollution reduction is based on the fact that in two of the last three years the levels have been barely below attainment. However, the third year in that threesome reveals a considerable level of nonattainment status, negating the slight reduction of the other two. Factor into this that the previous four years all revealed nonattainment status. So over a longer recent time frame, this means

that five of the last seven years are of nonattainment status. Is that grounds to remove these monitors that need to stay in place to help protect our health? If you own a wood-burning stove in your house, and you haven't had but one chimney fire within the past three years (chimney fires due to creosote buildup are the norm), would you discard your smoke and fire alarms? Due to the danger of potential chimney fires, one would never do this. The same thing applies to monitors. The potential for unhealthy particulate matter is so great, we must never lower our guard to monitor its level.

Don't get me wrong. I am not against industry, economic growth, or improvement, but not at the expense of our health. Don't think I or anyone here concerned about health wants the monitors to show nonattainment just to keep industry away. We all wish our air was the cleanest in the country, but instead just the opposite is the case. So, it's too early to tell if our air is being cleaned over a long-term basis. And how will we ever know if we remove the monitors? Everybody breathes the same air. Everyone should wish to know the quality of air they breathe, no matter his opinion on the monitor issue. We would hope that IDEM would honor its agency motto and help keep Indiana "a cleaner, healthier place to live."

Sincerely,  
Stephen VanMeter  
Stephen VanMeter  
712 W. Co. Rd. 475 S.  
Winslow, IN 47598  
1-812-749-4607

To: IDEM



For the record, please note that I am opposed to eliminating the air monitors in areas that are in Unonattainment status or nearly so.

Sincerely,  
Stephen Van Meter  
712 W. Co. Rd. 475 S.  
Winslow, IN 47598

812-749-4607



Dear Legislator,

Attached you will find a copy of a letter that was sent to IDEM in response to their public comment for placing all of Southwestern Indiana into attainment for PM2.5 pollution. Public comment period is open through March 31, 2008. We also want to urge you to attend the public hearing on March 27, 2008 at McCullough Library in Evansville IN at 5:30 pm. It is imperative that you protect the health and safety of our citizens and help us stop this plan from being adopted. It is a proven fact that PM2.5 causes respiratory illness, and cardiovascular disease. Our children and the elderly are most at risk. **We need your help and we need it NOW.**

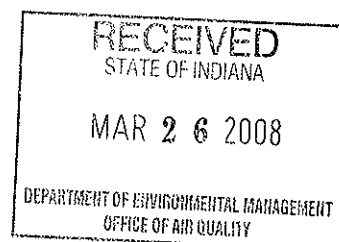
The redesignation plan can be found on IDEM website at the following address:  
[www.in.gov/idem/programs/air/redesignations/index.html](http://www.in.gov/idem/programs/air/redesignations/index.html).

We can not stress enough how much the citizens need you to help **protect our quality of life!!** Please get involved!!

Sincerely,

*Bill Kottler*

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels







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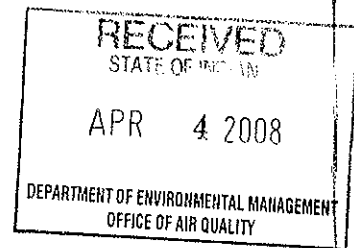
**Please help protect the Quality of Life in our state.**

Sincerely,



cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





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**Please help protect the Quality of Life in our state.**

Sincerely,

A handwritten signature in cursive script, appearing to read "David H. Spivey".

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels



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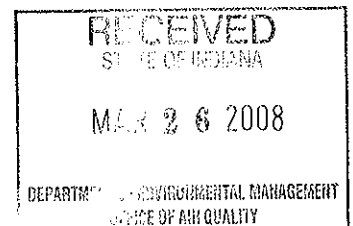
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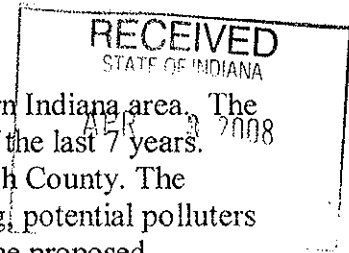
*Kathy Greenwood*

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





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**Please help protect the Quality of Life in our state.**

Sincerely,

A handwritten signature in dark ink, appearing to read "James H. Jones".

Evansville

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





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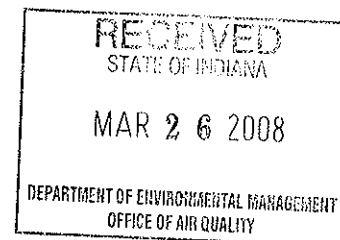
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**Please help protect the Quality of Life in our state.**

Sincerely,

*Rachel Lewis*  
(812)455-3560

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





To Whom It May Concern:

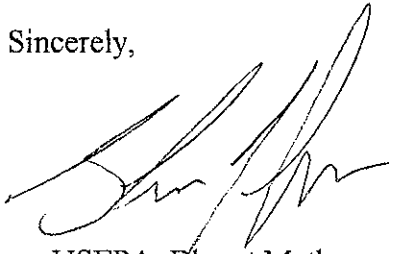
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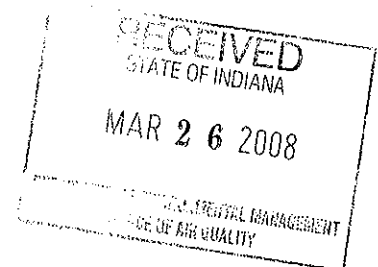
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**Please help protect the Quality of Life in our state.**

Sincerely,



cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





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**Please help protect the Quality of Life in our state.**

Sincerely,

*Jeff Country*  
916 E Franklin St  
Evansville IN.  
47711

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels

RECEIVED  
STATE OF INDIANA

APR 3 2008

DEPARTMENT OF ENVIRONMENT & LAND MANAGEMENT  
OFFICE OF THE SECRETARY



To Whom It May Concern:

RECEIVED  
STATE OF INDIANA

APR 3 2008

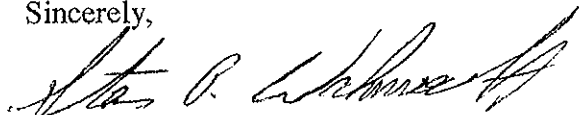
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The only thing accomplished with attainment status is to open the flood gates for polluting Industrial Development. It is a medically proven fact, that our children in Southern Indiana have huge rates of asthma. For their sake, don't let our children pay the ultimate price for all of the political pressure for Economic Development.

**Please help protect the Quality of Life in our state.**

Sincerely,

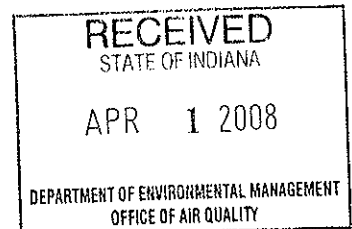


8144 Birch Dr.  
Newburgh IN 47630

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels







To Whom It May Concern:

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Sincerely,

A handwritten signature in black ink that appears to read "Don Ratz".

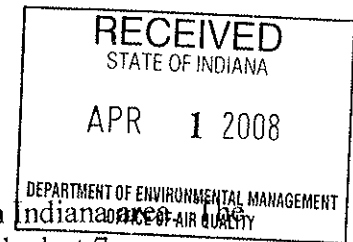
5809 LOST BEND LANE

EVANSVILLE, IN. 47715

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels



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Sincerely,

A handwritten signature in cursive script, reading "David A. Crowl".

cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





Scott Deloney, Chief  
Programs Branch  
Office of Air Quality MC61-50  
100 N. Senate Ave  
Indiana Department of Environmental Management  
Indianapolis, IN 46206-2251

Dear Mr. Deloney,

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Sincerely,

*Teresa L. Beadles*



Scott Deloney, Chief  
Programs Branch  
Office of Air Quality MC61-50  
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Indiana Department of Environmental Management  
Indianapolis, IN 46206-2251



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Please help protect the Quality of Life in our state.

Sincerely,

A handwritten signature in cursive script, appearing to read "Janet Brallen". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".





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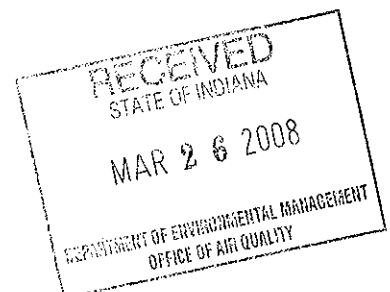
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Sincerely,



cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels





2185767

Dear Legislator,

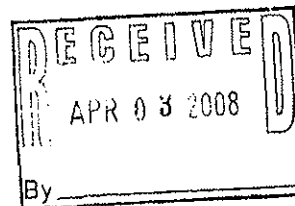
Attached you will find a copy of a letter that was sent to IDEM in response to their public comment for placing all of Southwestern Indiana into attainment for PM2.5 pollution. Public comment period is open through March 31, 2008. We also want to urge you to attend the public hearing on March 27, 2008 at McCullough Library in Evansville IN at 5:30 pm. It is imperative that you protect the health and safety of our citizens and help us stop this plan from being adopted. It is a proven fact that PM2.5 causes respiratory illness, and cardiovascular disease. Our children and the elderly are most at risk. **We need your help and we need it NOW.**

The redesignation plan can be found on IDEM website at the following address:  
[www.in.gov/idem/programs/air/redesignations/index.html](http://www.in.gov/idem/programs/air/redesignations/index.html).

We can not stress enough how much the citizens need you to help protect our quality of life!! Please get involved!!

Sincerely,

*Nancy J. Beck*



cc: USEPA, Bharat Mathur  
Kreg Battles, State Representative  
Dave Crooks, State Representative  
Senator Lindel Hume  
Senator Evan Bayh  
Gov Mitch Daniels



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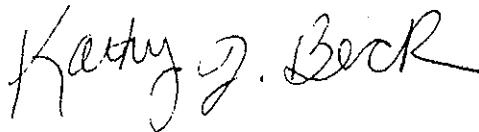
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Sincerely,

*Dale Beadler*

